

Felicia Majors
12020 Southern Highlands Parkway #1127
Las Vegas NV 89141

<input checked="checked" type="checkbox"/> FILED	<input type="checkbox"/> RECEIVED
<input type="checkbox"/> ENTERED	<input type="checkbox"/> SERVED ON
COUNSEL/PARTIES OF RECORD	
JUN 15 2015	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

In The United States District Court
For the District Of Nevada

Felicia Majors

VS

Centennial Hills Hospital

2:15-cv-01126-JCM-VCF

FEDERAL COURT

Complaint

I Felicia Majors residing at 12020 Southern Highlands Parkway #1127 Las Vegas NV 89141, believe that I have been discriminated against by bias and my race/ African American. In accordance with the Civil Rights Act of 1964 and Equal Employment, forbidding discrimination on the basis of race in hiring, promoting, and firing.

The defendant here in, Centennial Hills Hospital place of business located at 6900 N Durango Dr. Las Vegas NV 89149

I Felicia Majors worked as a registered nurse for a local staffing agency, Redwood Healthcare Staffing located 7312 Cheyenne Ave. Las Vegas NV 89129 On December 29, 2014 I was contacted by the Redwood Healthcare agency and told I was fired from Centennial Hills Hospital and placed on the Do Not Return/DNR list for the Valley Health System Hospitals.

I was accused of not meeting standards set forth by the Valley Health System/Centennial Hills Hospital, on an evaluation form signed by the Chief Nursing Officer John Cole smith. At no time did I get to talk to anyone at Centennial Hills Hospital about the situation or what I was accused of, I was fired and told not to come back. I believe this was a form of discrimination due to bias/race.

In fact even after I was accused and fired on December 20, 2014 I continued to work at Centennial Hills Hospital, working on December 22, 2014 and December 25 2014 on the night shift 7pm to 7:30am. I also worked at another Valley Health System Hospital, Summerlin Hospital on December 26, 2014, December 27, 2014, and December 28, 2014 all on the nightshift 7pm to 7:30am. I was also called by Maria a charge nurse at Centennial Hills Hospital from the IMC unit to pick up more hours.

The staff who wrote these statements accusing me is white/Caucasian. Blake Hathaway (Dialysis tech) Exhibit C, Constance Connie A. Sugg (Charge nurse) Exhibit D, Michelle (who was the house supervisor that night), and John A. Coldsmith (Chief nursing officer) are all of Caucasian decent/white. At no time was I rude to the patient or any patient in my care. The patient's written statement is proof of that, in the written statement of Janice Rodriquez (the patient) Exhibit B who was to receive dialysis clearly states who I was talking to. In the patients written statement Janice Rodriquez (the patient) clearly states that I was talking to Blake Hathaway the dialysis tech.

When Blake Hathaway approached me I was outside of the patient's room in the hallway, at no point or time did I get loud or rude in the patients room or with the patient in my care. Everyone has their own perception on what they believe is loud and also the same is true about what is embarrassing to them. My job as a nurse is to provide the best care possible to all patients and that is what I do for all patients in my care.

Exhibit A (The Valley Health System RN Agency Review) list 14 standards not met on December 20, 2014 as follows:

1. Consistently follow excellence standard
2. Alert, cheerful, and shows positive attitude toward work
3. Professional conduct displayed 100% of the time
4. Clinical skills are appropriate to the assignment
5. Displays team work and is flexible
6. Able to identify problems and offer suggestions
7. Able to use resources to solve problems and take action
8. Accept supervision and is cooperative with leadership
9. Language and conversation is appropriate / professional
10. Answers call lights promptly and communicates appropriately with patients and family and leadership
11. Understands and accomplishes assignments
12. Considerate of patient and family needs
13. Organizes care to optimize time, prioritizes appropriates
14. Clinical policies and procedures are followed consistently

I believe my rights were violated when I was not asked about the incident or to provide a statement before I was fired. I believe I was discriminated against due to bias.

My income has been affected, since this incident I have lost more than \$40,000 dollars. I can no longer work at any of the Valley Health Systems. All my income has come from the Valley Health System.

I have made over \$100,000 dollars in the last 2 years and in recent years at the Valley Health System which can be proven by my W2 forms. Since the incident occurred; I have been put in finical situations.

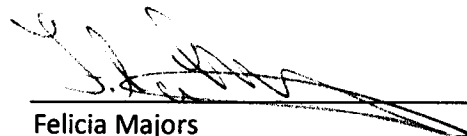
Damages

Since not being able to work for the Valley Health System, this started on December 28, 2014 and as of the day of writing this statement; which is June 8, 2015 I have lost a total income of \$41,760.00

This situation has caused me mental stress, depression, and finical ruin. The total I am asking for damages is \$1,000,000.00

Date

6/15/15



Felicia Majors
12020 Southern Highlands Parkway #1127
Las Vegas NV 89141

The Valley Health System

Exhibit A

RN Agency Review

DATE: 12, 20, 2014

NAME: MELICIA MAJORS

AGENCY: Ridwood

TITLE: RN

SHIFT: 7P → 0730

DEPT: THE STORK

1 = MEETS STANDARDS

2 = DID NOT MEET STANDARDS

PERSONAL QUALITIES	1	2	COMMENTS
Dependable, on time	X		
Appearance is professional, meets dress code standards	X		
Consistently follow service excellence standards		X	SEE ATTACHED
Alert, cheerful, and shows positive attitude toward work		X	
Professional conduct displayed 100% of time		X	
Clinical skills are appropriate to assignment		X	
Displays teamwork and is flexible		X	
Maintains confidentiality	X		
Completes all required orientation paperwork during first shift and turns into designated manager by end of first shift			
PROBLEM SOLVING			
Able to identify problems and offer suggestions		X	
Able to use resources to solve problems and take action		X	
Asks appropriate questions	X		
Knows Chain of Command	X		
Understands limitations and seeks help as needed	X		
COMMUNICATION			
Follows procedures for documentation and is legible and organized	X		
Keeps leadership informed of patient changes	X		
Accepts supervision and is cooperative with leadership		X	
Language and conversation is appropriate/professional		X	
Demonstrates participation and compliance with Hourly Rounding practices	X		
Completes Whiteboards in Patient room or area	X		
Answers call lights promptly and communicates appropriately with patient and family and leadership		X	
Participates appropriately in Bedside Report - SBAR format			
QUALITY OF CARE			
Accurately assesses patient's needs and implements plan of care	X		
Understands and accomplishes assignments		X	
Considerate of patient and family needs		X	
Adheres to elements of core measure processes	X		
Utilizes Teach-Back method for patient education	X		
Uses supplies and equipment effectively and appropriately	X		
Organizes care to optimize time, prioritizes appropriately		X	
Accesses policies and procedures for assistance with care	X		
Clinical policies and procedures are followed consistently		X	
Applies principles or growth and development to the following age groups assigned: <input type="checkbox"/> Neonates <input type="checkbox"/> Infants <input type="checkbox"/> Pediatrics <input type="checkbox"/> Adolescents <input checked="" type="checkbox"/> Adults <input checked="" type="checkbox"/> Geriatrics			

Date: 12, 20, 2014

☐ May Return☐ Evaluate Further☒ Do Not Return

Comments:

If candidate is a DNR, please circle reason below & attach documentation if available:

attendance attitude left without notice medication error license issue no call/no show patient care issue

poor job performance patient complaint suspected theft other

Evaluator Signature: Melicia MajorsPrint Evaluator: CONSTANCE A. SUGGManager's Signature: Melicia MajorsHouse Supervisor Signature: RNCNO Signature (Required for all DNR): Constance A. Sugg

Date: 12, 20, 14

THIS EVALUATION MUST BE COMPLETED AT THE END OF THE SHIFT BY CLINICAL SUPERVISOR AND RETURNED TO HOUSE SUPERVISOR/STAFFING OFFICE

My name is Jamie Rodriguez. I'm a patient in room 710. My Dialysis Nurse Blake Buttaway ask my nurse Felicia if she could sign a couple of signature so that we could get started on Dialysis. She yelled at him and I was shocked and felt embarrassed. He remained professional. When Corrie came into the room, she asked Felicia a question and she walked off without a word. My opinion is she was not very professional.

Jamie Rodriguez
Dec. 20. 2014

~~I notified my Nurse that I was going to set-up and do the PD treatment on Rodriguez Janice and was setting up when the nurse~~

I arrived at the hospital and notified the primary RN I would be doing Rodriguez Janice's PD treatment. While setting up the RN came to distribute meds I asked her if she would mind giving me pre-report and signatures. She refused. I then asked if she would be able to get a consent signed for the treatment. Her response (all of this in front of the Pt) was in a digitated tone, "I'll get the charge nurse" and she left. I later found out while I was gone the RN was complaining to the pt that "I wasn't even a RN". From that point the charge nurse was notified and she took care of my needs. My total delay was an hour. This treatment was a stat as was the other stat that I was trying to get to that my office had to reassign. I would like to thank the charge nurse Connie and the housing Supervisor Michelle for helping me resolve these issues.

-Blake Hatheway
Davita, cch

1 of 212-20-2014
2300

FELICIA WAS ASKED BY THE DIALYSIS TECH TO OBTAIN A CONSENT FOR PT DIALYSIS BY THE TECH.

SHE SAID SHE WAS PASSING MEDS. SHE HAD THEN COME TO ME AND SAID "YOU HAVE TO OBTAIN A CONSENT FROM THE PT. IN 710 AND CHANGE HER DRESSING" AND I SAID

NO YOU NEED TO STOP AND PASS FOR BLOODS AND DO IT IF HAVE TOO MUCH

GOING ON HERE -

- ① HAD A PT. TRYING TO DIE
- ② ANOTHER PT HAVING CP.
- ③ ANOTHER PT & BP IT
- ④ TRYING TO BOOK 2 BIOS.

SHE SAID NO YOU ARE THE CHARGE NURSE AND YOU NEED TO DO IT, SHE WAS VERY RUDE & LOUD.

WHEN I WENT INTO THE PRO ROOM, THE PT SAID SHE WAS VERY RUDE TO THE DIALYSIS TECH AND DID NOT WANT HER AS A NURSE ANYMORE.

I CHANGED THE DRESSING AND OBTAINED THE CONSENT AND NOTICED THE NURSE SUPERVISOR OR ADMINISTRATOR. ALSO ANOTHER PT COMPLAINED THAT SHE HAD TO CALL 3x FOR PAIN MEDS

Exhibit D

2 of 2

THIS PT US IN TIB.

WHAT I HAVE FOUND WITH
LUCIA SHE HAD A HARD TIME
MULTI TASKING, AND BEING RUN TO
STAFF AND PATIENTS IS UNACCEPTABLE.

Coma Guy